

CORRES CONTROL		
OUTGOING LTR NO		
DOE ORDER # 4700.1		
03-RF-00797		
DIST	LTR	ENC
DIETER, T		
FERRERA, D W		
FERRI, M.S.		
LINDSAY, D		
LYLE, J		
MARTINEZ, L. A.		
PARKER, A.		
POWERS, K.		
SHELTON, D C		
SPEARS, M.S.		
TRICE, K D		
TUOR, N R.		
AGUILAR, P		
ALBIN, C		
AUBLE, M.	X	X
BEAN, C		
BUTLER, J L		
CERCLAAR (T130G)	X	X
DECK, C		
FREIBOTH, C		
GEIS, A.		
GIBBS F	X	
HUMSTON, T		
KNAPP, S.	X	X
LARSON, E.		
MARSHALL, J R.		
MARTIN, D		
MYERS, K.		
NESTA, S.	X	X
NININGER, R.		
OLIVER, R.		
OMAN, K.		
PLAPPERT R.		
PRIMROSE, A.		
ROSENMAN, A.		
SNYDER, D P	X	
THOMPSON, J		
WIEMELT K.		
WILLIAMS, L.		
<i>Richard Nesta</i>	X	
CORRES CONTROL	X	X
ADMIN RECD/T130G		
TRAFFIC		
PATS/130		
CLASSIFICATION		
UCNI		
UNCLASSIFIED		
CONFIDENTIAL		
SECRET		
AUTHORIZED CLASSIFIER		
SIGNATURE.		
Date.		
IN REPLY TO RFP CC NO		
ACTION ITEM STATUS		
<input type="checkbox"/> PARTIAL/OPEN		
<input type="checkbox"/> CLOSED		
LTR APPROVALS		
ORIG & TYPIST INITIALS		
DPS pvt		



May 22, 2003

03-RF-0797

Mr Richard DiSalvo
Acting Assistant Manager for
Environment and Stewardship
DOE, RFFO

RSOP NOTIFICATION LETTER FOR COMPONENT REMOVAL, SIZE REDUCTION, AND
DECONTAMINATION ACTIVITIES AND FOR RCRA UNIT 59 CLOSURE IN BUILDING
569/570 – FEG-015-03

Attached is a draft transmittal letter to the Colorado Department of Public Health and
Environment for the RSOP notification for facility component removal, size reduction, and
decontamination activities, and RCRA Unit 59 closure in Building 569/570 The draft
transmittal letter has been prepared from DOE RFCA coordinator to CDPHE RFCA
coordinator

Please contact Steve Nesta x6386 with questions or concerns

Frank E Gibbs

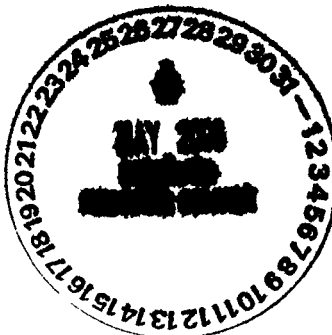
Frank E Gibbs
Deputy Project Manager
Remediation, Industrial D&D, and Site Services

Attachment
As Stated

SVK.pvt

Ong and 1 cc – Richard DiSalvo

cc Steve Tower



ADMIN RECORD

Kaiser-Hill Company, L.L.C

Courier Address Rocky Flats Environmental Technology Site, State Hwy 93 and Cactus, Rocky Flats, CO 80007 • 303 966 7000

Mailing Address PO Box 464, Golden, Colorado 80402-0464

IA-A-001420

Steven H Gunderson
Colorado Department of Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80222-1530

**RSOP NOTIFICATION LETTER FOR COMPONENT REMOVAL, SIZE REDUCTION, AND
DECONTAMINATION ACTIVITIES AND FOR RCRA UNIT 59 CLOSURE IN BUILDING
569/570**

Mr Gunderson

In accordance with the Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Component Removal, Size Reduction and Decontamination Activities, this letter and its attachments is notification for RSOP implementation. This notification is for all Decommissioning & Demolition activities, including the closure RCRA Unit 59 as outlined in Section 5 of the RSOP.

Once the pre-demolition survey is complete and the facility meets the unrestricted release criteria, an additional notification letter will be prepared to implement the RSOP for Facility Disposition.

Kaiser-Hill Company or a decommissioning subcontractor will conduct this work. If these organizations intend to use a method or process not included in the RSOP then they are required to notify Kaiser-Hill. Further, if they propose to use alternate methods, an additional notification will be made and, in consultation with DOE/LRA, the RFCA process for decision document modification will be used.

The appropriate checklists and information required by the RSOP are attached to this letter and should provide the necessary information. This work will be conducted in accordance with prepared work control documentation. The exact methods and process selected, and progress of the activities, will be communicated to DOE/LRA through the consultative process, particularly the weekly RISS status meetings. The facility will not be breached during the activity.

As indicated in the RSOP, the LRA has 30 days to review the RSOP notification letter and provide feedback, including a definitive reason for not proceeding with the project. If no feedback is received within 30 days, the project will proceed as planned.

If you have any questions regarding this, please contact Steve Tower at (303) 966-2133.

Richard DiSalvo
Acting Assistant Manager for
Environment and Stewardship
U S Department of Energy

RSOP for Component Removal, Size Reduction, and Decontamination Activities Checklist

Project scope: Building 569 component removal, size reduction, and decontamination			
Facility description: Counter area of B569/570 permitted as RCRA Unit 59, and used to store waste before, during and after RTR/NDA activities			
Description of planned activity(ies): Closure of RCRA Unit 59, and D&D of B569/570			
Facility/rooms/sets/areas involved: Entire building			
Is RCRA unit closure(s) part of the planned activity?			<input checked="" type="checkbox"/> Yes
If RCRA units are included, attach unit specific information sheets and drawings			<input type="checkbox"/> No*
*RCRA unit closure will be addressed under a separate notification letter			
Attach checklists from Appendix A of the RSOP. See RCRA Closure Information document attached		<input type="checkbox"/>	Component Removal/Size Reduction
		<input checked="" type="checkbox"/>	Decontamination
RLCR Status	<input type="checkbox"/>	RLCR complete and concurrence received:	
	<input checked="" type="checkbox"/>	RLCR initiated but incomplete; concurrence anticipated. 5/30/2003	
	<input type="checkbox"/>	RLC has not been initiated¹ and is scheduled for initiation on:	
If RLCR is not complete or initiated, what data will be used to plan the work activities?		Work activities will not proceed until RLCR is complete	
Activity requires modification to the ARARs listed in the RSOP			<input type="checkbox"/> Yes, attach to letter
			<input checked="" type="checkbox"/> No
Attach Administrative Record file requirements for the activity			
Point of contact for each facility/activity Mike Auble (303) 966-3391			
Duration of work activities		Anticipated work start	
2 weeks (RCRA closure only), 3 weeks for building D&D		7/1/03	
Attach schedule for each facility or activity for information purposes. Attached			
Does the activity involve removing contaminated portions of the building shell? Include a description of the activity, contamination levels and controls			<input type="checkbox"/> Yes, LRA consultation and concurrence required
			<input checked="" type="checkbox"/> No

¹ Evaluate using DPP, Sections 114 and 115 and the consultative process to implement activities

RSOP for Component Removal, Size Reduction, and Decontamination Activities Checklist

Are there deviations/exceptions to the RSOP for the proposed activity(ies)?												Yes
											X	No
Provide an explanation of deviation/exception to the RSOP: Not applicable												
C Check the appropriate resulting action box below												
Additional RFCA decision document required (PAM – IM/IRA)												
Major modification to RSOP							Field change to RSOP					
Minor modification to RSOP							LRA consultation					
Activity(ies) will result in the following waste types											Process waste	
											Remediation waste	
	TRU	X	LLW	X	LLMW	X	Haz.	X	Sanitary		Other	
LRA Notification Review Time							14 days, no RCRA unit closure involved					
					X		30 days, RCRA unit closure involved					

**FACILITY COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION
ACTIVITY CHECKLIST**

Building: 569/570

Closure Project Manager: M. H. Auble

COMPONENT REMOVAL/SIZE REDUCTION

Gloveboxes	
Tanks and ancillary equipment (located both inside and outside the facility)	
Fume hoods	
Ventilation/filtration systems (both inside and outside the facility)	X
Utilities and other equipment (both inside and outside the facility, including electrical, steam, and fire suppression systems)	X
Walls	X
Floors	X
Ceilings	X
Roofs	X
Other structural members	X
Other*	

Small tools	X
Paving breaker, jackhammer and/or similar tools used to break up concrete	X
Excavators, such as backhoes, to excavate underground components, such as tanks and ancillary equipment	X
Hoists and cranes	X
Plasma arc cutter	
Diamond wire saw	
Wachs cutter	
Laser cutter	
Oxy-torch cutter	
Hydraulic shears	X
Shear baler	
Water cutter using abrasives	
Arc air slice	
Arbor press	
Non-explosive cracking agent	
Other *	

* Describe "Other" Component Type(s) and/or Removal/Size Reduction Technique(s)

**FACILITY COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION
ACTIVITY CHECKLIST**

DECONTAMINATION

Gloveboxes	
Tanks and ancillary equipment (located both inside and outside the facility)	
Fume hoods	
Ventilation/filtration systems (both inside and outside the facility)	
Utilities and other equipment (both inside and outside the facility, including electrical, steam, and fire suppression systems)	
Walls	
Floors	X
Ceilings	
Roofs	
Other structural members	
Other*	

Wiping/scrubbing/washing with water or detergents	
Vacuuming	
Strippable Coating	
Grinding	
Scarifying	X
Scabbling	X
Paving breaker/chipping hammer	
Spalling	
Abrasive/grit blasting	
CO ₂ blasting	
Hydrolasing	
Strong mineral acids	
Organic or weak acids	
Additional oxidants, such as cerium and other similar metals	
Other *	

* Describe "Other" Component(s) and/or Decontamination Technique(s)

Note In the event a planned activity falls outside the scope of this RSOP, the closure project manager will consult with DOE and the LRA to determine whether this RSOP should be modified to include the activity, or whether a separate decision document should be written

Prepared by S. V. Knapp

Date: 5/20/03

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Administrative Record Requirements for this Activity

- Final Rocky Flats Cleanup Agreement (RFCA)
- RFETS Decommissioning Program Plan (DPP)
- RFCA Standard Operating Protocol for Component Removal, Size Reduction, and Decontamination Activities
- Reconnaissance Level Characterization Report B569/570
- Notification Letter and subsequent CDPHE correspondence, if appropriate

INTRODUCTION

The Rocky Flats Environmental Technology Site's (RFETS) "RFCA Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities, Section 5 0, Revision 0, February 4, 2001" addresses closure of RCRA regulated units

This document applies to RCRA Unit 59 which includes the "Bay" area of B569, which was used for storage of drums being processed through Real Time Radiography (RTR), Drum Counter, LOSAC Counter, and Crate Counter. Complete closure will be accomplished in accordance with one of the closure options outlined in the RSOP (Sections 5 1 1 – 5 1 3)

Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions, with engineering, health and safety, and waste management information, will be developed prior to the start of closure activities. These instructions will be developed in accordance with applicable RFETS policies and procedures.

SYSTEM HISTORY AND WASTE CHARACTERIZATION

RCRA Unit 59 was associated with NDA activities conducted in B569, and was used to store drums of hazardous waste before, during and after these activities. Storage was limited to the "Bay" area of B569. The EPA hazardous waste codes that apply to Unit 59 are D001-D043, F001-F009, F027, F039, P001-P205, U001-U012, U014-U039, U041-U053, U055-U064, U066-U099, U101-U103, U105-U138, U140-U174, U176-U194, U196, U197, U200-U211, U213-U223, U225-U228, U234-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, and U404.

All hazardous waste was removed from the facility, and the unit was placed in a RCRA Stable configuration on April 4, 2003.

System Boundaries

The boundary of Unit 59 is limited to the "Bay" area of B569. Please see the attached Figure for the boundaries of the unit.

CLOSURE OPTIONS

A review of the available RCRA Operating Record including weekly inspection logs, Supervisor's Log Book, ECATS, PATS, and the Spill Occurrence report, indicates that hazardous or low-level mixed waste was never spilled to the floor of the building, which served as the secondary containment of the unit, from 1994 to 2003, although rainwater from a leaking roof was noted and subsequently cleaned up. RCRA inspection logs are incomplete for the period 10/19/95-1/3/96, when the unit was operated under interim status, 1/4/96-7/1/96, and 10/30/96-1/7/97, however entries into the Supervisor's Log Book for this interim status time period confirm the lack of spills from waste containers. Due to the incomplete nature of the RCRA log, or corresponding Supervisor's Log Book entries, Unit 59 will be closed in accordance with Section 5 1 2, "Unit Removal In Conjunction with "Debris Rule" Treatment", of the RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities. Based on this

option, the floor of the unit will be scabbled to remove a minimum of 0.6 cm of the surface of the floor. The resulting surface will be visually inspected to ensure it meets the definition of a "clean debris surface", as defined in 6 CCR 1007-3, Part 268.45, Table 1. Material collected through the scarification process will be analyzed for constituents of concern, and disposed of accordingly. Since no spills were ever noted in the overall RCRA Operating Record, analysis for specific waste codes will not be conducted. The remaining concrete will be disposed of as sanitary waste.

SOIL CONTAMINATION EVALUATION AND POST CLOSURE CARE

A review of the Historical Release Report indicates no under building contamination (UBC) associated with this building. Soil sampling is not planned for activities conducted under this RSOP notification. ER will characterize the area after the building is removed. Remediation of this site will depend on the characterization results. ER will perform any soil remediation under the *ER RSOP for Routine Soil Remediation*, however it is assumed that this will be a NFA site.

RECORDKEEPING

RCRA unit closure activities will be documented in the Decommissioning Final Closeout Report as opposed to the Pre-Demolition Survey Report (PDSR) which will be completed prior to demolition of the units. When final closure of Unit 59 is completed, the Site's Master List of RCRA units will be updated with the closure status and a permit modification will be submitted to remove the units from the RCRA Part A and Part B Permit.